

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

TREY GREENE, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

ZAC PRINCE, FLORI MARQUEZ, TONY
LAURA, JENNIFER HILL and GEMINI
TRADING, LLC

Defendants.

Case No. 2:23-CV-01165-KM-LDW

**[PROPOSED] ORDER
APPOINTING LEAD
PLAINTIFF AND APPROVING
LEAD PLAINTIFF'S
SELECTION OF COUNSEL**

WHEREAS the above-captioned class action was filed on February 28, 2023; and

WHEREAS, pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. § 77z-1(a)(3)(A)(i) and § 78u-4(a)(3)(A)(i), on March 1, 2023, a notice was issued to potential class members of the action informing them of their right to move to serve as lead plaintiff within 60 days of the date of the issuance of said notice; and

WHEREAS on May 1, 2023, class member Yacov Baron ("Movant") timely moved the Court for appointment as lead plaintiff and approval of his selection of lead counsel; and

WHEREAS the PSLRA, provides, *inter alia*, that the most-adequate plaintiff to serve as lead plaintiff is the person or group of persons that has either filed a complaint or has made a motion in response to a notice, has the largest financial interest in the relief sought by the Class, and satisfies the pertinent requirements of Fed. R. Civ. P. 23; and

WHEREAS the Court finds that Movant has the largest financial interest in this action and also *prima facie* satisfies the typicality and adequacy requirements of Fed. R. Civ. P. 23. *See* 15 U.S.C. § 77z-1(a)(3)(B)(iii)(I) and § 78u-4(a)(3)(B)(iii)(I);

IT IS HEREBY ORDERED THAT:

1. Pursuant to Section 27 of the Securities Act of 1933 and Section 21D of the Securities Exchange Act of 1934, Movant is appointed as Lead Plaintiff of the Class.

2. Movant's selection of Counsel, the Law Firms of Kantrowitz, Goldhamer & Graifman, P.C. and Longman Law, P.C., are appointed as lead counsel.

3. Lead Counsel, after being appointed by the Court, shall manage the prosecution of this litigation. Lead Counsel is to avoid duplicative or unproductive activities and is hereby vested by the Court with the responsibilities that include, without limitation, the following: (1) to prepare all pleadings; (2) to direct and coordinate the briefing and arguing of motions in accordance with the schedules set by the orders and rules of this Court; (3) to initiate and direct discovery; (4) to prepare the case for trial; and (5) to engage in settlement negotiations on behalf of Lead Plaintiff and the Class.

SO ORDERED:

Dated: _____ 2023

Honorable Kevin McNulty
U.S. District Judge